

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY:JMW SCANNED BY: KB/12-8

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KURTIS JAMES VANDERMOLEN,

Defendant.

FELONY INFORMATION

1:22-cr-171

Robert J. Jonker
U.S. District Judge

The United States Attorney charges:

COUNT 1
(Bank Fraud)

On or about July 23, 2020, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

KURTIS JAMES VANDERMOLEN,

knowingly, and with the intent to defraud, executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the control of, Cross River Bank, a financial institution, by submitting a Paycheck Protection Program loan application for a fictitious company, Breakout Strategies Corporation, that resulted in the deposit of \$100,641 in loan proceeds in a credit union account in the Western District of Michigan.

18 U.S.C. § 1344(2)

COUNT 2
(Money Laundering)

On or about September 1, 2020, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

KURTIS JAMES VANDERMOLEN,

knowingly engaged in a monetary transaction, in and affecting commerce, in criminally derived property of a value greater than \$10,000 that was derived from a specified unlawful activity. Specifically, while engaged in the scheme and artifice to defraud described in Count 1 of this Felony Information and incorporated herein by reference, the defendant withdrew \$18,752 from the Breakout Strategies Corporation account at Consumers Credit Union on check number 1105 and thereby made payment to complete the purchase of a 2010 BMW 650i convertible.

18 U.S.C. § 1957

FORFEITURE ALLEGATION
(Bank Fraud)

The allegations contained in Count 1 of this Information are re-alleged and incorporated by reference as if set forth fully herein for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 982(a)(2)(A), upon conviction of bank fraud in violation of 18 U.S.C. § 1344(2) as set forth in Count 1 of this Information, the defendant,

KURTIS JAMES VANDERMOLEN,

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL PROPERTY: CZ firearms with serial numbers UC11369 and UC12145.

2. MONEY JUDGMENT. A sum of money equal to at least \$170,002, which represents the amount of gross proceeds obtained, directly or indirectly, from the offense charged in Count 1.

3. SUBSTITUTE ASSETS. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).


18 U.S.C. § 982(a)(2)(A)

21 U.S.C. § 853(p)

18 U.S.C. § 1344(2)

MARK A. TOTTEN
United States Attorney

Date: December 8, 2022


ADAM B. TOWNSHEND
Assistant United States Attorney